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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
others similarly situated,

Plaintiffs,

vs.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-(PAL)

**PLAINTIFFS' MOTION FOR LEAVE TO
FILE DOCUMENTS UNDER SEAL**

1 Pursuant to Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Local Rule IA 10-5(a),
2 and Section 14.3 of the Revised Stipulation and Protective Order issued by this Court on February 10,
3 2016, ECF No. 217 (the “Protective Order”), Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon
4 Vera, Luis Javier Vazquez, and Kyle Kingsbury (collectively, “Plaintiffs”), on behalf of themselves and
5 all others similarly situated, hereby move this Court for leave to lodge certain documents under seal
6 related to their Opposition to Defendant Zuffa, LLC’s Motion to Seal Its Reply In Support Of Motion
7 For Summary Judgment And Related Materials (ECF No. 611) (the “Opposition”).

8 Under Section 14.3 of the Protective Order, documents designated Confidential or Highly
9 Confidential – Attorneys’ Eyes Only “shall be provisionally lodged under seal with the Court, and
10 redacted papers shall be publicly filed. Within 5 days of the materials being lodged with the Court, the
11 Party claiming protection shall file motion to seal setting forth the bases for sealing and proper authority
12 under *Kamakana v. City & County of Honolulu*, 447 F.3d 1172 (9th Cir. 2006), or some other applicable
13 authority.”

14 Plaintiffs seek leave to file the documents listed below under seal on the sole basis that Zuffa has
15 designated these documents Confidential or Highly Confidential – Attorneys’ Eyes Only under the
16 Protective Order. As Plaintiffs have stated in their Opposition, Plaintiffs do not believe compelling
17 reason exist to seal the documents, and oppose sealing the documents for that reason. However, because
18 the documents are currently designated Confidential or Highly Confidential – Attorneys’ Eyes Only,
19 Plaintiffs seek leave of the Court to file them under seal.

20 Plaintiffs seek leave to lodge under seal portions of the Opposition that relate to materials Zuffa
21 has designated Confidential or Highly Confidential – Attorneys’ Eyes Only under the Protective Order.

22 Plaintiffs seek leave to lodge under seal portions of Exhibit 1 to the Declaration of Kevin E.
23 Rayhill (the “Rayhill Declaration”) that relate to materials Zuffa has designated Confidential or Highly
24 Confidential – Attorneys’ Eyes Only under the Protective Order.

25 Plaintiffs have filed all of these documents under seal. Plaintiffs have publicly filed placeholders
26 for redacted versions of these documents with the Court, and will serve un-redacted versions of these
27 documents on Defendant.
28

1 Dated: November 16, 2018

Respectfully Submitted,
JOSEPH SAVERI LAW FIRM, INC.

3 By: /s/Joseph R. Saveri
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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of November, 2018 true and correct copies of the following documents were served via the District of Nevada's ECF system to all counsel of record who have enrolled in the ECF system:

- **PLAINTIFFS' MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL**
- **PROPOSED ORDER**

By:

/s/ Kevin E. Rayhill